

REMARKS

Reconsideration and allowance of this application are respectfully requested in light of the above amendments and the following remarks.

Claims 9-11 and 15 have been amended, and claims 13 and 14 have been canceled. Support for the amendments is provided for example in Fig. 4B and the specification on page 22, line 9, through page 23, line 6.

Claims 9 and 15 were rejected, under 35 USC §103(a), as being unpatentable over Inoue (US 2002/0031108) in view of Hsing et al. (US 6,167,025). Claims 10-14 were rejected, under 35 USC §103(a), as being unpatentable over Inoue in view of Hsing and Ishiyama et al. (US 2001/0014917). To the extent these rejections may be deemed applicable to the amended claims, the Applicants respectfully traverse based on the points set forth below.

Claim 9 now defines a mobile network control apparatus that registers a binding between a home address of a first interface at which a failure is detected, as a home address, and an address of an alternative second interface as a care-of address, in a home agent of the interface at which a failure is detected. That is, the subject matter of the claimed invention relates to securing an alternative route for connection when packet tunneling executed using a first interface of a mobile network control apparatus fails (i.e., when communication disconnection occurs). The claimed subject matter supports eliminating a need for nodes of a mobile network to change a default router, thereby eliminating extra processing loads and latency associated with changing a default router and updating care-of address bindings (see specification page 9, line 17, through page 10, line 6). (References herein to the specification and drawings are for illustrative

purposes only and are not intended to limit the scope of the invention to the referenced embodiments.)

As acknowledged in the Final Rejection, Inoue discloses using one interface as a back-up of another interface for a multi-home state condition (see Inoue paragraph [0077] and Final Rejection page 3, lines 2-10). However, Inoue discloses that packets transmitted to an address of an interface on a side at which a failure (i.e., communication disconnection) is detected (e.g., cellular phone network 6) are directed to the interface at which a failure is detected. Therefore, the packets are not transferred to an interface on a back-up side (e.g., home local network 3) and portable terminal device 20 cannot receive the packets. That is, a configuration to solve the above-described problem is not disclosed. Inoue's disclosed back-up selects in advance a supplementary route taking into consideration states of networks on the transmitting side (see Inoue paragraph [0078]), but does not establish an alternative route for the interface on the side at which a failure is detected, as acknowledged in the Final Rejection (see Final Rejection page 3, last paragraph).

Hsing discloses detecting a routine failure between an ATM switch and other switches, searching for other switches when calls of a switch exceed the maximum capacity, and establishing a connection (see Hsing col. 9, line 21, through col. 10, line 60). However, Hsing does not disclose or suggest the claimed subject matter of registering a binding between a home address of an interface at which a failure is detected, as a home address, and an address of an alternative interface as a care-of address, in a home agent of the interface at which a failure is detected.

Accordingly, the Applicants submit that the teachings of Inoue and Hsing, considered individually or in combination, do not render obvious the subject matter now defined by new claim 9. Independent claim 15 similarly recites the above-mentioned subject matter distinguishing apparatus claim 9 from the applied references, but with respect to a method. Therefore, the rejections applied to claims 10-12 are obviated and allowance of claims 9 and 15 and all claims dependent therefrom is considered to be warranted.

In view of the above, it is submitted that this application is in condition for allowance, and a notice to that effect is respectfully solicited.

If any issues remain which may best be resolved through a telephone communication, the Examiner is requested to telephone the undersigned at the local Washington, D.C. telephone number listed below.

Respectfully submitted,

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